



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
PREVENTION, PESTICIDES AND
TOXIC SUBSTANCES

MEMORANDUM

Subject: EPA Reg. No.: 502-591 (D226911/ Case# 011572)

From: Mark J. Perry, Biologist
Precautionary Review Section
Registration Support Branch
Registration Division (7505W)

MJP
6-26-96

To: J. Miller, PM-23 / D. Kenny
Registration Division (7505C)

Applicant: Chas.H. Lilly Co.
7737 NE Killingsworth
Portland, OR 97218

FORMULATION FROM LABEL:

	% by wt.
<u>Active Ingredient(s):</u> Zinc sulfate monohydrate	99.0
<u>Inert Ingredient(s):</u>	1.0
Total:	100%

BACKGROUND

In support of reregistration the registrant has submitted a new dermal sensitization study for EPA Reg. No. 802-591. The five remaining acute data requirements for this product have already been satisfied (see 3/3/94 PRS review). The dermal sensitization study was performed by Cosmopolitan Safety Evaluation and the assigned MRID number 440245-01.

2.

RECOMMENDATION

1. Acute Oral: Category III / Cited
2. Acute Dermal: Category III / Acceptable
3. Acute Inhalation: Category III / Acceptable
4. Eye Irritation: Category I / Cited
5. Dermal Irritation; Category IV / Cited
6. Dermal Sensitization Non-sensitizer / Acceptable

PRS recommends that granular test materials be reduced to a powder prior to application. Furthermore, the study report references the protocol, however a copy of the protocol is not included.

LABELING

1. The recommended signal word is "danger."
2. The recommended precautionary statements are as follows:

Corrosive. Causes irreversible eye damage. Harmful if swallowed or absorbed through skin or inhaled. Do not get in eyes or on clothing. Avoid contact with skin. Avoid breathing dust. Wear goggles or face shield. Wash thoroughly with soap and water after handling. Remove contaminated clothing and wash clothing before reuse.

3. The recommended statements of practical treatment are as follows:

IF SWALLOWED: Call a physician or Poison Control Center. Do not induce vomiting. Drink promptly a large quantity of milk, egg whites, gelatin solution, or if these are not available, drink large quantities of water. Avoid alcohol.

IF ON SKIN: Wash with plenty of soap and water. Get medical attention.

IF INHALED: Remove victim to fresh air. If not breathing, give artificial respiration, preferably mouth-to-mouth. Get

medical attention.

IF IN EYES: Hold eyelids open and flush with steady, gentle stream of water for 15 minutes. Get medical attention.

4. The following should appear separate from but in close proximity to the statements of practical treatment:

NOTE TO PHYSICIAN: Probable mucosal damage may contraindicate the use of gastric lavage.

5. Restricted Use classification recommended due to the eye irritation toxicity category. The PM Team should decide if restricted use classification is necessary or if alternative labeling will allay the requirement for restricted use classification.

6. Child-resistant packaging is recommended due to eye irritation.

4 .
DATA REVIEW FOR SKIN SENSITIZATION TESTING (81-6)

Product Manager:23

MRID No.:440245-01

Testing Laboratory:Cosmopolitan

Author(s):A. Buss

Species:Guinea pig

Weight:374-406 g

Source: Ace Animals

Test Material: Moss-Kil Granules

Positive Control Material: 1,4-phenylenediamine dihydrochloride

Quality Assurance (40 CFR 160.12):Present

Reviewer:M. Perry

Report Date:5/17/96

Report No.:F3462

Method: Buehler

Summary:

1. **Classification:** Non-sensitizer / Acceptable

Deviation From 81-6: See recommendations

Results: Induction was performed with 100% (moistened). Challenge was performed with a 10% concentration in distilled water. Following challenge, comparison of the test and control groups did not demonstrate a sensitizing response. A positive control study successfully demonstrated a sensitizing response.

5.

ACUTE TOX ONE-LINER

1. PC CODE: 087801

2. CURRENT DATE: 6/25/96

3. TEST MATERIAL: Zinc chloride (zinc as metallic..29.4%)

Study/Species/Lab/ Study#/Date	MRID No.	Results	Tox. Cat.	Core Grade
81-6, Guinea pig, CSE, F3356, 10/16/93	430792-02	Non-sensitizer	---	A

Core Grade Key:

A = Acceptable

S = Supplementary

U = Unacceptable